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Attorneys for Defendants

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON

J.B.,

Plaintiff,

v.

LEVI GRAY, JAYSON LEAK, PAUL KIZER, JOHN WALLACE, JAMIE DENNISON, FELIPE URZUA-PEREZ, STEPHEN MARTIN, THOMAS JOST, ROBERT YONALLY, LISA ARRINGTON, CHAD NAUGLE, NICOLE BROWN, MIKE REESE, and JOHN DOE,

Defendants.

Case No. 3:23-cv-01962-CL

DECLARATION OF NATHAN RIEMERSMA IN SUPPORT OF MOTION FOR EXTENSION OF TIME TO FILE ANSWER

I, Nathan Riemersma, declare:

1. I am an attorney licensed to practice law in the State of Oregon and admitted to practice before the United States District Court for the District of Oregon. I am employed as an

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Assistant Attorney General with the Oregon Department of Justice and the Attorney in Charge of the Corrections Litigation Unit.

2. I make this declaration in support of the Motion for Extension of Time and under penalty of perjury.
3. The deadline for filing the answer to Plaintiff's First Amended Complaint is March 7, 2025. Defendants request an extension of time, up to and including March 21, 2025, within which to obtain representation authority for the newly-named state defendant and file the answer.
4. ORS 180.060(8) prohibits the Attorney General from appearing on behalf of any officer, department, agency, board or commission without its consent in any action, suit, matter, cause, or proceeding in any court or before a state or federal regulatory board.
5. We are obtaining defense requests for the newly-named individual but have not yet finalized that process. Accordingly, the State is not yet authorized to waive service.
6. For these reasons, defendant requests an extension of time up to and including March 21, 2025.
7. I certify pursuant to LR 7-1 I conferred with Plaintiff's Counsel Lynn Walsh via email and she does not object to this request for extension of time.
8. This motion is made in good faith, and not for purposes of undue delay.

I declare under penalty of perjury that the foregoing is true and correct.

EXECUTED on March 17, 2025.

s/ Nathan K Riemersma
NATHAN K RIEMERSMA
Assistant Attorney General